

## **REMARKS**

Applicant respectfully requests reconsideration and allowance of the subject application.

### **Drawing Revisions**

Enclosed herewith is a substitute drawing sheet containing Figs. 9 and 10, which were objected to by the Draftsperson. Applicant respectfully requests approval of the substitute drawing sheet.

### **35 U.S.C. § 102 - Tanaka**

In the Office Action mailed July 24, 2003, Claims 1-9, 12-19, 21-22, 24-25, 27, 34-35, 43, 48, 50-52, 57-58, 60 and 61-71 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,299,535 to Motoharu Tanaka (hereinafter "Tanaka"). Claims 7, 19, 48, 50-52 and 68 have been canceled without prejudice. Applicant respectfully submits that claims 1-6, 8-9, 12-18, 21-22, 24-25, 27, 34-35, 43, 57-58, 60, 61-67 and 69-71 are not anticipated by Tanaka.

Tanaka discloses:

At startup, the CPU 12 reads the program and data required for execution of the game through the CD-ROM drive 18 from a computer readable program product, that is, the CD-ROM 30, based on the operating system stored in the ROM 13 and transfers the same to the RAM 14 and hard disk drive 15. Col. 9, lines 1-6.

Thus, Tanaka discloses a system that boots using a conventional operating system loaded from ROM 13. This disclosure is different from a game console that boots into a console application stored on a hard disk drive.

Claim 1, as amended, recites:

A game console comprising a hard disk drive that is non-removable from the game console and that stores a console application to which the game console boots that presents a graphical user interface providing navigation to media on the game console, wherein the hard disk drive is segregated into a user data region and an application region.

The Tanaka reference fails to disclose or suggest "... a hard disk drive that is non-removable from the game console and that stores a console application to which the game console boots ...."

Further, the Tanaka reference fails to disclose a game console having a hard disk drive that is segregated into a user data region and an application region. Tanaka discloses "The RAM 14 stores the game program and image data read by the CD-ROM drive 18 from the CD-ROM 30 in its different areas. Further, the game program or image data may be stored in the hard disk drive 15." Col. 3, lines 52-55. However, this disclosure is not the same as segregating a hard disk drive in a game console into a user data region and an application region.

Accordingly, Tanaka fails to disclose the elements of claim 1. Thus, for at least these reasons, Applicant respectfully submits that claim 1 is allowable over Tanaka.

Given that claims 2-6, 8-9 and 12 depend from amended claim 1, Applicant respectfully submits that claims 2-6, 8-9 and 12 are likewise allowable over Tanaka for at least the reasons discussed above.

Claim 13, as amended, recites:

A game console comprising a housing that contains each of:  
a portable media reader;  
a processor; and  
a hard disk drive coupled to the processor, the hard disk drive being configured to boot the game console and to store data associated with the game console, wherein the processor:  
is coupled to receive video game instructions for a video game from portable media in the portable media reader;  
executes the video game using the game instructions read from the portable media in the portable media reader;  
is coupled to a controller to receive user commands when executing the video game; and  
sends video game data to the controller to be saved.

Although the Tanaka reference discloses a keypad 50 to provide operational input to a CPU 12 (See Fig. 1), Tanaka fails to disclose a game console that saves video game data to a controller. Accordingly, Tanaka fails to disclose the elements of claim 13. Thus, for at least these reasons, Applicant respectfully submits that claim 13 is allowable over Tanaka.

Given that claims 14-17 depend from amended claim 13, Applicant respectfully submits that claims 14-17 are likewise allowable over Tanaka for at least the reasons discussed above.

Claim 18, as amended, recites:

A game console comprising a processor and a hard disk drive coupled to the processor, wherein the hard disk drive stores a console application to which the game console boots, and wherein the hard disk drive stores application data such that data associated with a first application is inaccessible to other applications.

The Tanaka reference fails to disclose a game console having a hard disk drive that “stores application data such that data associated with a first application is inaccessible to other applications”. Although Tanaka discloses a hard disk drive, Tanaka fails to disclose storing application data such that data associated with a first application is inaccessible to other applications. Accordingly, Tanaka fails to disclose the elements of claim 18. Thus, for at least these reasons, Applicant respectfully submits that claim 18 is allowable over Tanaka.

Given that claim 21 depends from amended claim 18, Applicant respectfully submits that claim 21 is likewise allowable over Tanaka for at least the reasons discussed above.

Claim 22, as amended, recites:

A video game system, comprising:  
a processor; and  
a hard disk drive coupled to the processor, the hard disk drive being segregated into: a first region to store user data that includes game data saved by a user of the video game system when the processor executes a video game; and a second region to store application data that includes data specific to the video game executed by the processor, wherein user data associated with the video game is segregated from user data associated with other video game applications and wherein the application data associated with the video game is segregated from application data associated with other video game applications.

The Tanaka reference fails to disclose a video game system that includes a hard disk drive that segregates user data associated with one video game from user data associated with another video game, and segregates application data associated with one video game from application data associated with other video game applications. Although Tanaka mentions storing data to a disk drive (as discussed

above with respect to claim 1), the Tanaka reference fails to disclose the segregation of data as recited in claim 22. Accordingly, Tanaka fails to disclose the elements of claim 22. Thus, for at least these reasons, Applicant respectfully submits that claim 22 is allowable over Tanaka.

Given that claims 24-25 depend from amended claim 22, Applicant respectfully submits that claims 24-25 are likewise allowable over Tanaka for at least the reasons discussed above.

Claim 27 recites:

A method comprising:  
identifying a game identifier associated with a video game installed in a game console, wherein the game console contains a hard disk drive;  
determining portions of the hard disk drive that are associated with the video game based on the game identifier; and  
preventing the video game from accessing portions of the hard disk drive that are not associated with the video game.

The Tanaka reference fails to disclose a game identifier as recited in claim 27. Furthermore, Tanaka fails to disclose “determining portions of the hard disk drive that are associated with the video game based on the identifier” as recited in claim 27. Accordingly, Tanaka fails to disclose the elements of claim 27. Thus, for at least these reasons, Applicant respectfully submits that claim 27 is allowable over Tanaka.

Given that claims 34-35 depend from claim 27, Applicant respectfully submits that claims 34-35 are likewise allowable over Tanaka for at least the reasons discussed above.

Claim 43, as amended, recites:

A method comprising:

booting a game console from a hard disk drive integrated into the game console, wherein the hard disk drive stores a console application that presents a user interface; and

the console application providing navigation to media, the media selected from the group consisting of:

media containing a game; and

media containing a movie.

The Tanaka reference fails to disclose a “console application providing navigation to media, the media selected from the group consisting of: media containing a game; and media containing a movie.” (Emphasis Added) Accordingly, Tanaka fails to disclose the elements of claim 43. Thus, for at least these reasons, Applicant respectfully submits that claim 43 is allowable over Tanaka.

Claim 57, as amended, recites:

A computer-readable medium for a game console comprising computer-executable instructions that, when executed, direct the game console to:

associate user data with a first region of a hard disk drive contained in the game console;

associate video game application data with a second region of the hard disk drive;

allow a video game application to access particular portions of the first region that are associated with the video game application;

allow the video game application to access particular portions of the second region that are associated with the video game application; and

prevent the video game application from accessing portions of the first region and the second region that are associated with other applications.

The Tanaka reference fails to disclose preventing a video game application from “accessing portions of the first region and the second region that are associated with other applications” as recited in claim 57. Accordingly, Tanaka fails to disclose the elements of claim 57. Thus, for at least these reasons, Applicant respectfully submits that claim 57 is allowable over Tanaka.

Given that claims 58 and 60 depend from amended claim 57, Applicant respectfully submits that claims 58 and 60 are likewise allowable over Tanaka for at least the reasons discussed above.

Claim 61 recites:

A video game system console comprising a common enclosure for both a processor and a hard disk drive, wherein the hard disk drive is a non-removable component of the common enclosure that must be present for the video game system console to boot to a video game console application that presents a graphical user interface providing a consistent user experience when navigating to different media types available on the video game system console.

The Tanaka reference fails to disclose a video game system console that provides “a consistent user experience when navigating to different media types available on the video game system console” (Emphasis Added) as recited in claim 61. Accordingly, Tanaka fails to disclose the elements of claim 61. Thus, for at least these reasons, Applicant respectfully submits that claim 61 is allowable over Tanaka.

Given that claims 62-66 depend from claim 61, Applicant respectfully submits that claims 62-66 are likewise allowable over Tanaka for at least the reasons discussed above.

Claim 67, as amended, recites:

A game console comprising a processor, a portable media reader, a game controller including both an input device and a portable media reader-writer device, and a non-removable hard disk drive, wherein:

the portable media reader, the game controller, and the non-removable hard disk drive are coupled to the processor;

the non-removable hard disk drive stores a console application to which the game console boots;

the processor executes a video game using game instructions read from the portable media reader;

the processor receives input from the input device of the game controller;

the processor saves game data from the video game to portable media in the portable media reader-writer device of the game controller; and

the processor executes game instructions read from the portable media reader.

As discussed above with respect to claim 13, the Tanaka reference fails to disclose a game console that saves game data to a game controller. Accordingly, Tanaka fails to disclose the elements of claim 67. Thus, for at least these reasons, Applicant respectfully submits that claim 67 is allowable over Tanaka.

Claim 69, as amended, recites:

A game console comprising:

an input port for receiving input from a controller operable by a player to generate video game control signals;

an output port for outputting a display of three-dimensional video game play graphics for a television;

a processor for executing instructions of a video game program;

a controller system coupled to said input port and to said processor for executing commands related to the video game control signals;

a portable media reader for optically reading media to be executed by the processor so as to output to the output port a display of graphics in accordance with the media; and



a fixed disk in a non-removable hard disk drive in communication with the processor, the fixed disk including a boot sector for storing boot instructions to boot the processor to load an initial program, wherein:

upon booting the processor to load the initial program, the execution of the initial program by the processor outputs to the output port a display of a user interface that provides a prompt for selecting media to execute on the game console; and

the processor executes instructions that are read from the selected media by the portable media reader.

The Tanaka reference fails to disclose a game console “that provides a prompt for selecting media to execute on the game console” as recited in claim 69. Accordingly, Tanaka fails to disclose the elements of claim 69. Thus, for at least these reasons, Applicant respectfully submits that claim 69 is allowable over Tanaka.

Given that claims 70-71 depend from amended claim 69, Applicant respectfully submits that claims 70-71 are likewise allowable over Tanaka for at least the reasons discussed above.

### **35 U.S.C. § 102 – Links Manual**

In the Office Action mailed July 24, 2003, claims 1, 10-11, 13, 18, 20, 22-23, 26-33, 36-43, 44-49 and 57 were rejected under 35 U.S.C. §102(b) as being anticipated by the Links 386CD Players Manual (hereinafter "Links Manual"). Claims 37, 46 and 48-49 have been canceled without prejudice. Applicant respectfully submits that claims 1, 10-11, 13, 18, 20, 22-23, 26-33, 36, 38-43, 44-45, 47 and 57 are not anticipated by the Links Manual.

The Links Manual discloses installing and executing an application on a general purpose computer. After the general purpose computer has been booted

with its general purpose operating system, such as DOS (Disk Operating System), the general purpose computer may then execute one or more applications, such as the Links 386CD application described in the Links Manual.

As discussed above, amended claim 1 recites a hard disk drive that is “segregated into a user data region and an application region.” The Links Manual fails to disclose this segregation of data into different regions of a hard disk drive. Accordingly, Applicant submits that claim 1 is allowable over the Links Manual.

Given that claims 10-11 depend from amended claim 1, Applicant respectfully submits that claims 10-11 are likewise allowable over the Links Manual for at least the reasons discussed above.

As discussed above, amended claim 13 recites a game console that saves video game data to a controller. Although the Links Manual mentions saving game data, the Links Manual does not disclose saving video game data to a controller. Accordingly, Applicant submits that claim 13 is allowable over the Links Manual.

As discussed above, amended claim 18 recites a game console having a hard disk drive that “stores application data such that data associated with a first application is inaccessible to other applications”. The Links Manual fails to disclose this technique for storing data. Accordingly, Applicant submits that claim 18 is allowable over the Links Manual.

Given that claim 20 depends from amended claim 18, Applicant respectfully submits that claim 20 is likewise allowable over the Links Manual for at least the reasons discussed above.

As discussed above, amended claim 22 recites a hard disk drive that segregates user data associated with one video game from user data associated with another video game, and segregates application data associated with one video game from application data associated with other video game applications. The Links Manual fails to disclose the segregation of data as recited in claim 22. Accordingly, Applicant submits that claim 22 is allowable over the Links Manual.

Given that claims 23 and 26 depend from amended claim 22, Applicant respectfully submits that claims 23 and 26 are likewise allowable over the Links Manual for at least the reasons discussed above.

As discussed above, amended claim 27 recites a game identifier and recites “determining portions of the hard disk drive that are associated with the video game based on the game identifier”. The Links Manual fails to disclose the use of a game identifier. Accordingly, Applicant submits that claim 27 is allowable over the Links Manual.

Given that claims 28-33 depend from amended claim 27, Applicant respectfully submits that claims 28-33 are likewise allowable over the Links Manual for at least the reasons discussed above.

Claim 36, as amended, recites:

A method comprising:

retrieving a list of recently used nicknames in a game console, wherein at least one nickname in the list of recently used nicknames is associated with a first game application, and wherein at least one nickname in the list of recently used nicknames is associated with a second game application;

displaying the list of recently used nicknames to a user of the game console; and

allowing the user of the game console to select a nickname from the list of recently used nicknames.

Although the Links Manual discloses the use of a player name, the Links Manual does not disclose “at least one nickname in the list of recently used nicknames is associated with a first game application, and wherein at least one nickname in the list of recently used nicknames is associated with a second game application” (Emphasis Added) as recited in claim 36. Accordingly, Applicant submits that claim 36 is allowable over the Links Manual.

Given that claims 38-42 depend from amended claim 36, Applicant respectfully submits that claims 38-42 are likewise allowable over the Links Manual for at least the reasons discussed above.

As discussed above, amended claim 43 recites a “console application providing navigation to media, the media selected from the group consisting of: media containing a game; and media containing a movie.” The Links Manual fails to disclose a console application providing the navigation recited in claim 43. Accordingly, Applicant submits that claim 43 is allowable over the Links Manual.

Given that claims 44-45 and 47 depend from amended claim 43, Applicant respectfully submits that claims 44-45 and 47 are likewise allowable over the Links Manual for at least the reasons discussed above.

As discussed above, amended claim 57 recites preventing a “video game application from accessing portions of the first region and the second region that are associated with other applications.” The Links Manual fails to disclose preventing a video game application from accessing regions of a hard disk drive. Accordingly, Applicant submits that claim 57 is allowable over the Links Manual.

Applicant respectfully requests that the §102 rejections be withdrawn.

**Conclusion**

Claims 1-6, 8-18, 20-36, 38-45, 47, 57-58, 60-67 and 69-71 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. Should any matter in this case remain unresolved, the undersigned attorney respectfully requests a telephone conference with the Examiner to resolve any such outstanding matter.

Respectfully Submitted,

Date: Oct. 24, 2003

By:   
Steven R. Sponseller  
Reg. No. 39,384  
(509) 324-9256